

# EXHIBIT C

**From:** [Daniel Watson](#)  
**To:** [Lai Yip](#); [Nitin Khanna](#); [Jim Vaughn](#); [Kazim Naqvi](#)  
**Cc:** [Rena Andoh](#); [Travis Anderson](#); [Waqas Anis](#); [James Salem](#); [Jonathan Karchmer](#)  
**Subject:** RE: Moog v. Skyrise/ - Important Advisory Announcements  
**Date:** Wednesday, June 29, 2022 3:56:40 PM

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Good afternoon Lai,

Apologies again for the delay!

Please find below, the connection information your team will need to begin review:

**Zoom link:**

<https://idsinc.zoom.us/j/4689850187?pwd=WEhnbmpBbnZuTFI0dEZWeDVnYUlvZz09>

Meeting ID: 468 985 0187

Passcode: 832896

**VM connection information:**

User: Lai Yip

Remote Desktop address: 67.23.116.82:63391

User: Kazim Naqui

Remote Desktop address: 67.23.116.82:63392

User: Bruce Pixley

Remote Desktop address: 67.23.116.82:63389

User: Kevin Crozier

Remote Desktop address: 67.23.116.82:63393

User: Lauren Quick

Remote Desktop address: 67.23.116.82:63390

We will provide a follow-up email to you with the passwords for all Users.  
They will be able to change them to anything they would like once they are logged in.

Please note that not all data has been uploaded for review.  
We are adding this data to the network share on a rolling basis as it becomes available.

Once reviewers connect to Zoom and verify IDs, you and team should be underway!

Thank you!

**Daniel Watson**

## Technology Manager

Direct: 202.552.4455

[iDSinc.com](https://idsinc.com)

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**From:** Lai Yip <[LYip@sheppardmullin.com](mailto:LYip@sheppardmullin.com)>

**Sent:** Wednesday, June 29, 2022 12:39 PM

**To:** Daniel Watson <[dwatson@idsinc.com](mailto:dwatson@idsinc.com)>; Nitin Khanna <[nkhanna@idsinc.com](mailto:nkhanna@idsinc.com)>; Jim Vaughn <[JVaughn@idsinc.com](mailto:JVaughn@idsinc.com)>; Anthony Green <[green.a@wssllp.com](mailto:green.a@wssllp.com)>; Kazim Naqvi <[KNaqvi@sheppardmullin.com](mailto:KNaqvi@sheppardmullin.com)>; Kelley.Storey@lw.com

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**Subject:** RE: Moog v. Skyrise/ - Important Advisory Announcements

### [EXTERNAL SENDER]

Jonathan and the iDS team, following up again. This is our third time inquiring about this issue (providing Zoom link(s) and facilitating inspection), without any response from iDS. We need a response urgently. We have started receiving laptops and are ready to review today.

Regards,

**Lai L. Yip**

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**From:** Lai Yip <[LYip@sheppardmullin.com](mailto:LYip@sheppardmullin.com)>

**Sent:** Tuesday, June 28, 2022 2:31 PM

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**Subject:** RE: Moog v. Skyrise/ - Important Advisory Announcements

iDS, following up regarding the **below**. When will you be sending the Zoom link(s)? Also, do you have estimated delivery dates for the inspection laptops? Thanks.

**Lai L. Yip**

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**From:** Lai Yip <[LYip@sheppardmullin.com](mailto:LYip@sheppardmullin.com)>

**Sent:** Monday, June 27, 2022 11:21 AM

**To:** Daniel Watson <[dwatson@idsinc.com](mailto:dwatson@idsinc.com)>; Nitin Khanna <[nkhanna@idsinc.com](mailto:nkhanna@idsinc.com)>; Jim Vaughn <[JV Vaughn@idsinc.com](mailto:JV Vaughn@idsinc.com)>; Anthony Green <[green.a@wssllp.com](mailto:green.a@wssllp.com)>; Kazim Naqvi <[KNaqvi@sheppardmullin.com](mailto:KNaqvi@sheppardmullin.com)>; [Kelley.Storey@lw.com](mailto:Kelley.Storey@lw.com)

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**Subject:** RE: Moog v. Skyryse/ - Important Advisory Announcements

Daniel and iDS,

Assuming that Moog's inspection laptops arrive tomorrow (Tuesday), the following individuals plan to log onto the virtual machines as follows **this week**:

Kevin Crozier

Wed., Thurs., & Fri. approximately 9 a.m. to 5 p.m. **Central**

Bruce Pixley & Lauren Quick

Tues. (assuming receipt of laptops in morning) approx. 1-5 p.m. **Pacific**

Wed. & Thurs. approx. 9:30-5 p.m. **Pacific**

Lai Yip

Thurs. approx. 10-11:30 a.m. & 2-4 p.m. **Pacific**

We may update and supplement the above as needed. **Please confirm per Section III.E of the inspection protocol that iDS will send the Zoom information in advance of the inspection and will be available to facilitate the inspection** (e.g., check identification, enable the reviewer's account, etc.).

Thanks,

**Lai L. Yip**

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**From:** Daniel Watson <[dwatson@idsinc.com](mailto:dwatson@idsinc.com)>

**Sent:** Wednesday, June 22, 2022 8:06 AM

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**Subject:** RE: Moog v. Skyrise/ - Important Advisory Announcements

Good morning team,

After speaking with Nitin, I need to update the timeline slightly.

While the configuration for WiFi is no issue, there are some logistical issues to sort out on our end as far as organization and shipping of machines.

We will be getting your laptops in the mail on **Monday, June 27, by EOD.**

Apologies for the initial, overzealous timeline!

Please reach out with any questions or concerns.

Thank you!

**Daniel Watson**

**Technology Manager**

Direct: 202.552.4455

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---

**From:** Daniel Watson

**Sent:** Tuesday, June 21, 2022 2:53 PM

**To:** Lai Yip <[LYip@sheppardmullin.com](mailto:LYip@sheppardmullin.com)>; Nitin Khanna <[nkhanna@idsinc.com](mailto:nkhanna@idsinc.com)>; Jim Vaughn <[JVaughn@idsinc.com](mailto:JVaughn@idsinc.com)>; Anthony Green <[green.a@wssllp.com](mailto:green.a@wssllp.com)>; Kazim Naqvi <[KNaqvi@sheppardmullin.com](mailto:KNaqvi@sheppardmullin.com)>; [Kelley.Storey@lw.com](mailto:Kelley.Storey@lw.com)

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**Subject:** RE: Moog v. Skyrise/ - Important Advisory Announcements

Good afternoon team,

Thank you for the WiFi configuration details!

These have been noted, and are set to be configured on each laptop, where applicable.

Currently, the VMs are spun up and inspection laptops only need this WiFi configuration information applied.

[@Nitin Khanna](#), if you can confirm please, I believe they will be ready to ship once this configuration information is input.

Pending confirmation, I believe these laptops will be ready to ship tomorrow, or Thursday at the latest.

As for the reviewers that wish to plug an Ethernet cable into their laptops, this is no issue, and no configuration is required.

Finally, we agree on the remaining licenses.

We can install those to VMs as the licenses become available, no need to wait on that.

Please reach out with any questions or concerns.

Thank you!

**Daniel Watson**

***Technology Manager***

Direct: 202.552.4455

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---

**From:** Lai Yip <[LYip@sheppardmullin.com](mailto:LYip@sheppardmullin.com)>

**Sent:** Monday, June 20, 2022 3:19 PM

**To:** Nitin Khanna <[nkhanna@idsinc.com](mailto:nkhanna@idsinc.com)>; Jim Vaughn <[JVaughn@idsinc.com](mailto:JVaughn@idsinc.com)>; Anthony Green <[green.a@wssllp.com](mailto:green.a@wssllp.com)>; Kazim Naqvi <[KNaqvi@sheppardmullin.com](mailto:KNaqvi@sheppardmullin.com)>; [Kelley.Storey@lw.com](mailto:Kelley.Storey@lw.com)

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**Subject:** RE: Moog v. Skyrise/ - Important Advisory Announcements

[EXTERNAL SENDER]

Jonathan,

Can you please let us know the ETA for delivering the configured inspection laptops to Moog's reviewers, along with an ETA for when our virtual machines will be ready to be logged into through those inspection laptops?

Regarding the inspection laptops, as Nitin requested last Thursday (and seeing no objection from defendants), we privately provided to Nitin and Daniel the SSID/passwords for our reviewers' respective WiFi connections this morning. In light of the foregoing, please let us know if you need anything else before Moog's reviewers can receive the configured inspection laptops.

With respect to the virtual machines, we plan to privately send you the UltraEdit license ID/password tomorrow (assuming we receive no objection from defendants). We are still in the process of obtaining the license for Understand. However, even if these tools are not yet installed in the virtual machines, we would like access without the tools if that is possible (knowing that the tools will be installed ASAP), so that we can expedite the access. In light of the foregoing, please let us know if you need anything else before Moog's reviewers can be permitted access to the virtual machines.

Given the expedited discovery schedule, we would like to commence our inspection as soon as possible. So if there is anything else we can do to help move things forward, please let us know.

Thank you,

**Lai L. Yip**

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**From:** Nitin Khanna <[nkhanna@idsinc.com](mailto:nkhanna@idsinc.com)>

**Sent:** Thursday, June 16, 2022 12:34 PM

**To:** Jim Vaughn <[JV Vaughn@idsinc.com](mailto:JV Vaughn@idsinc.com)>; Lai Yip <[LYip@sheppardmullin.com](mailto:LYip@sheppardmullin.com)>; Anthony Green <[green.a@wssllp.com](mailto:green.a@wssllp.com)>; Kazim Naqvi <[KNaqvi@sheppardmullin.com](mailto:KNaqvi@sheppardmullin.com)>; [Kelley.Storey@lw.com](mailto:Kelley.Storey@lw.com)

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**Subject:** RE: Moog v. Skyrise/ - Important Advisory Announcements

Hello all,

Due to the lockdown we are implementing on the inspection laptops, reviewers will not be able to select their Wi-Fi connections after they receive their laptop. To address this concern, we have 2 options available:

1. The reviewers can send us their SSID/password for all Wi-Fi connections they will be using.
2. The reviewers can plug the laptop directly into their router via Ethernet cable.

Should you choose to go to with option 1, we'll need the reviewer to send us (Daniel and I *only*) their SSID(s)/password(s) so we can have it embedded in the laptop settings and ready for you when it arrives.

Thank you,

**Nitin Khanna**  
**IT Administrator**

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**From:** Jim Vaughn <[JV Vaughn@idsinc.com](mailto:JV Vaughn@idsinc.com)>

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**Subject:** Re: Moog v. Skyrise/ - Important Advisory Announcements

Hello All,

A few updates/announcements:

1. We've applied all password and decryption keys we've been given. I have asked Waqas to give this group the current list of what we still need on that front.
2. Beginning tomorrow, Jonathan Karchmer will be the lead Consultant in my absence. As a reminder from earlier this week, I'll be out for two weeks.
3. Nitin will be out next week, but Daniel Watson will cover the IT set tasks. Reminder to coordinate with him for the ex-parte software licensing install needs. iDS relies on the parties to reply to us and to make their needs known for these issues. Meanwhile, we will continue to update as Inspection Laptops go out, virtual servers are set up, data is copied to the servers, etc.
4. We have no issues using the splash screen provide by Moog's counsel, I saw no objections to



that and Nitin/Daniel will put that in place on the virtual server side.

5. We can start putting Individual Defendant and Corporate Defendant data onto the Moog virtual server, minus the images that are still in privilege mode (Kelley will get back to us on reconciling the hash issues), and of course some devices are being excluded as identified by Anthony.

Please let us know if you have any questions, and please keep this group on the threads for continuity.

Thank you

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**Jim Vaughn, GCFE, EnCE**

***Managing Director***

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**From:** Lai Yip <[LYip@sheppardmullin.com](mailto:LYip@sheppardmullin.com)>

**Date:** Wednesday, June 15, 2022 at 10:27 AM

**To:** Anthony Green <[green.a@wssllp.com](mailto:green.a@wssllp.com)>, Jim Vaughn <[JVaughn@idsinc.com](mailto:JVaughn@idsinc.com)>, Kazim Naqvi <[KNaqvi@sheppardmullin.com](mailto:KNaqvi@sheppardmullin.com)>, "[Kelley.Storey@lw.com](mailto:Kelley.Storey@lw.com)" <[Kelley.Storey@lw.com](mailto:Kelley.Storey@lw.com)>

**Cc:** Rena Andoh <[RAndoh@sheppardmullin.com](mailto:RAndoh@sheppardmullin.com)>, Travis Anderson

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<[mireles.a@wssllp.com](mailto:mireles.a@wssllp.com)>, James Salem <[JSalem@sheppardmullin.com](mailto:JSalem@sheppardmullin.com)>

**Subject:** Moog v. Skyrise/BitLocker Recovery Keys & Passwords

[EXTERNAL SENDER]

All,

In the evidence tracker, we filled in the BitLocker recovery keys for all of the devices Moog turned over that require such a key, with the following exceptions: (1) E0037, an external drive provided to us by defendant Ms. Kim, which is opened with a *password* that was provided to us by Ms. Kim, not a BitLocker recovery key; and (2) E0034, which is a very old laptop belonging to Mr. Pilkington that we understand he encrypted himself and/or has the BitLocker recovery key for (Moog does not have the key). The evidence tracker is attached. Note that because it contains recovery keys and passwords, we would ask that all parties treat this as **HIGHLY CONFIDENTIAL—OUTSIDE COUNSEL & EXPERTS ONLY**, and have edited the file name accordingly.

Jim, you had previously said to Anthony that only a “decryption key” would suffice, rather than a “login password” (see email below from June 8 at 4:17 p.m.). **Anthony**, you later said that “bitlocker decryption keys would have been used only on Moog devices and perhaps Skyrise devices, but not their personal devices” (see email below from June 8 at 4:27 p.m.).

To clarify for Anthony, a BitLocker *password* can get past the BitLocker encryption—i.e., you do not necessarily need a BitLocker recovery *key*. Below is a screenshot of the BitLocker dialogue window for forensic software, which asks that the user supply a “valid credential (*password*, recovery key or file)” to allow access. And it appears that Ms. Kim does use passwords in lieu of recovery keys—as noted above, that is what she did for E0037. (We assume that when Jim was referring to “login password,” he was referring to something else.)



**Anthony**, for the personal devices that require a BitLocker recovery key or password (e.g., E0008), we would request that you ask your clients for either a key or *password*. We would also request that you ask Mr. Pilkington for a key or password for the E0034 device referred to above that was turned over by Moog.

Also, for personal devices E0009 and E0013, which iDS indicates requires a “password,” we assume you are obtaining those from your clients (and are not waiting on anything from Moog).

Thank you,

**Lai L. Yip**

+1 415-774-3147 | direct

[LYip@sheppardmullin.com](mailto:LYip@sheppardmullin.com) | [Bio](#)

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---

**From:** Anthony Green <[green.a@wssllp.com](mailto:green.a@wssllp.com)>

**Sent:** Wednesday, June 8, 2022 4:27 PM

**To:** Jim Vaughn <[JVaughn@idsinc.com](mailto:JVaughn@idsinc.com)>; Kazim Naqvi <[KNaqvi@sheppardmullin.com](mailto:KNaqvi@sheppardmullin.com)>;  
[Kelley.Storey@lw.com](mailto:Kelley.Storey@lw.com)

**Cc:** Rena Andoh <[RAndoh@sheppardmullin.com](mailto:RAndoh@sheppardmullin.com)>; Travis Anderson

<[TAnderson@sheppardmullin.com](mailto:TAnderson@sheppardmullin.com)>; Lai Yip <[LYip@sheppardmullin.com](mailto:LYip@sheppardmullin.com)>;

[MSubject@hodgsonruss.com](mailto:MSubject@hodgsonruss.com); [RFluskey@hodgsonruss.com](mailto:RFluskey@hodgsonruss.com); [SKYRYSEMOOG.LWTEAM@lw.com](mailto:SKYRYSEMOOG.LWTEAM@lw.com);

[tflynn@harrisbeach.com](mailto:tflynn@harrisbeach.com); Alexander Truitt <[truitt.a@wssllp.com](mailto:truitt.a@wssllp.com)>; Waqas Anis <[wanis@idsinc.com](mailto:wanis@idsinc.com)>;

Annabel Mireles <[mireles.a@wssllp.com](mailto:mireles.a@wssllp.com)>

**Subject:** RE: Moog v. Skyrise/Protective Order & Inspection Protocol

Hi Jim,

My clients have informed me that bitlocker decryption keys would have been used only on Moog devices and perhaps Skyrise devices, but not their personal devices. That being the case, it doesn't appear my clients will be able to help with rectifying this impediment. Sorry I can't be of more help.

Thanks,

Anthony

Sent from my Verizon, Samsung Galaxy smartphone

----- Original message -----

From: Jim Vaughn <[JV Vaughn@idsinc.com](mailto:JV Vaughn@idsinc.com)>

Date: 6/8/22 6:25 PM (GMT-05:00)

To: Anthony Green <[green.a@wssllp.com](mailto:green.a@wssllp.com)>, Kazim Naqvi <[KNaqvi@sheppardmullin.com](mailto:KNaqvi@sheppardmullin.com)>, [Kelley.Storey@lw.com](mailto:Kelley.Storey@lw.com)

Cc: Rena Andoh <[RAndoh@sheppardmullin.com](mailto:RAndoh@sheppardmullin.com)>, Travis Anderson <[TAnderson@sheppardmullin.com](mailto:TAnderson@sheppardmullin.com)>, Lai Yip <[LYip@sheppardmullin.com](mailto:LYip@sheppardmullin.com)>, [MSubjeck@hodgsonruss.com](mailto:MSubjeck@hodgsonruss.com), [RFluskey@hodgsonruss.com](mailto:RFluskey@hodgsonruss.com), [SKYRYSEMOOG.LWTEAM@lw.com](mailto:SKYRYSEMOOG.LWTEAM@lw.com), [tflynn@harrisbeach.com](mailto:tflynn@harrisbeach.com), Alexander Truitt <[truitt.a@wssllp.com](mailto:truitt.a@wssllp.com)>, Waqas Anis <[wanis@idsinc.com](mailto:wanis@idsinc.com)>, Annabel Mireles <[mireles.a@wssllp.com](mailto:mireles.a@wssllp.com)>

Subject: Re: Moog v. Skyrise/Protective Order & Inspection Protocol

You bet, and I just received your other email so I wanted to acknowledge that as well.

Thanks

----

**Jim Vaughn, GCFE, EnCE**

***Managing Director***

535 Anton Blvd., Suite 860 | Costa Mesa, CA. 92626

Direct: 714.261.0348 | [jvaughn@idsinc.com](mailto:jvaughn@idsinc.com)

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---

**From:** Anthony Green <[green.a@wssllp.com](mailto:green.a@wssllp.com)>

**Date:** Wednesday, June 8, 2022 at 3:21 PM

**To:** Jim Vaughn <[JV Vaughn@idsinc.com](mailto:JV Vaughn@idsinc.com)>, Kazim Naqvi <[KNaqvi@sheppardmullin.com](mailto:KNaqvi@sheppardmullin.com)>, "[Kelley.Storey@lw.com](mailto:Kelley.Storey@lw.com)" <[Kelley.Storey@lw.com](mailto:Kelley.Storey@lw.com)>

**Cc:** Rena Andoh <[RAndoh@sheppardmullin.com](mailto:RAndoh@sheppardmullin.com)>, Travis Anderson <[TAnderson@sheppardmullin.com](mailto:TAnderson@sheppardmullin.com)>, Lai Yip <[LYip@sheppardmullin.com](mailto:LYip@sheppardmullin.com)>, "[MSubjeck@hodgsonruss.com](mailto:MSubjeck@hodgsonruss.com)" <[MSubjeck@hodgsonruss.com](mailto:MSubjeck@hodgsonruss.com)>, "[RFluskey@hodgsonruss.com](mailto:RFluskey@hodgsonruss.com)" <[RFluskey@hodgsonruss.com](mailto:RFluskey@hodgsonruss.com)>, "[SKYRYSEMOOG.LWTEAM@lw.com](mailto:SKYRYSEMOOG.LWTEAM@lw.com)" <[SKYRYSEMOOG.LWTEAM@lw.com](mailto:SKYRYSEMOOG.LWTEAM@lw.com)>, "[tflynn@harrisbeach.com](mailto:tflynn@harrisbeach.com)" <[tflynn@harrisbeach.com](mailto:tflynn@harrisbeach.com)>, Alexander Truitt <[truitt.a@wssllp.com](mailto:truitt.a@wssllp.com)>, Waqas Anis <[wanis@idsinc.com](mailto:wanis@idsinc.com)>, Annabel Mireles <[mireles.a@wssllp.com](mailto:mireles.a@wssllp.com)>

**Subject:** RE: Moog v. Skyryse/Protective Order & Inspection Protocol

[EXTERNAL SENDER]

Thank you for the clarification, Jim.

Sent from my Verizon, Samsung Galaxy smartphone

----- Original message -----

From: Jim Vaughn <[JVaughn@idsinc.com](mailto:JVaughn@idsinc.com)>

Date: 6/8/22 6:16 PM (GMT-05:00)

To: Anthony Green <[green.a@wssllp.com](mailto:green.a@wssllp.com)>, Kazim Naqvi <[KNaqvi@sheppardmullin.com](mailto:KNaqvi@sheppardmullin.com)>, [Kelley.Storey@lw.com](mailto:Kelley.Storey@lw.com)

Cc: Rena Andoh <[RAndoh@sheppardmullin.com](mailto:RAndoh@sheppardmullin.com)>, Travis Anderson <[TAnderson@sheppardmullin.com](mailto:TAnderson@sheppardmullin.com)>, Lai Yip <[LYip@sheppardmullin.com](mailto:LYip@sheppardmullin.com)>, [MSubjeck@hodgsonruss.com](mailto:MSubjeck@hodgsonruss.com), [RFluskey@hodgsonruss.com](mailto:RFluskey@hodgsonruss.com), [SKYRYSEMOOG.LWTEAM@lw.com](mailto:SKYRYSEMOOG.LWTEAM@lw.com), [tflynn@harrisbeach.com](mailto:tflynn@harrisbeach.com), Alexander Truitt <[truitt.a@wssllp.com](mailto:truitt.a@wssllp.com)>, Waqas Anis <[wanis@idsinc.com](mailto:wanis@idsinc.com)>, Annabel Mireles <[mireles.a@wssllp.com](mailto:mireles.a@wssllp.com)>

Subject: Re: Moog v. Skyryse/Protective Order & Inspection Protocol

I am trying to gain access to the data on all respective devices delivered by all respective parties that are running encryption. Letter B below.

Thank you

----

**Jim Vaughn, GCFE, EnCE**

**Managing Director**

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Direct: 714.261.0348 | [jvaughn@idsinc.com](mailto:jvaughn@idsinc.com)

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**From:** Anthony Green <[green.a@wssllp.com](mailto:green.a@wssllp.com)>

**Date:** Wednesday, June 8, 2022 at 1:51 PM

**To:** Jim Vaughn <[JV Vaughn@idsinc.com](mailto:JV Vaughn@idsinc.com)>, Kazim Naqvi <[KNaqvi@sheppardmullin.com](mailto:KNaqvi@sheppardmullin.com)>, "[Kelley.Storey@lw.com](mailto:Kelley.Storey@lw.com)" <[Kelley.Storey@lw.com](mailto:Kelley.Storey@lw.com)>

**Cc:** Rena Andoh <[RAndoh@sheppardmullin.com](mailto:RAndoh@sheppardmullin.com)>, Travis Anderson <[TAnderson@sheppardmullin.com](mailto:TAnderson@sheppardmullin.com)>, Lai Yip <[LYip@sheppardmullin.com](mailto:LYip@sheppardmullin.com)>, "[MSubjeck@hodgsonruss.com](mailto:MSubjeck@hodgsonruss.com)" <[MSubjeck@hodgsonruss.com](mailto:MSubjeck@hodgsonruss.com)>, "[RFluskey@hodgsonruss.com](mailto:RFluskey@hodgsonruss.com)" <[RFluskey@hodgsonruss.com](mailto:RFluskey@hodgsonruss.com)>, "[SKYRYSEMOOG.LWTEAM@lw.com](mailto:SKYRYSEMOOG.LWTEAM@lw.com)" <[SKYRYSEMOOG.LWTEAM@lw.com](mailto:SKYRYSEMOOG.LWTEAM@lw.com)>, "[tflynn@harrisbeach.com](mailto:tflynn@harrisbeach.com)" <[tflynn@harrisbeach.com](mailto:tflynn@harrisbeach.com)>, Alexander Truitt <[truitt.a@wssllp.com](mailto:truitt.a@wssllp.com)>, Waqas Anis <[wanis@idsinc.com](mailto:wanis@idsinc.com)>, Annabel Mireles <[mireles.a@wssllp.com](mailto:mireles.a@wssllp.com)>

**Subject:** RE: Moog v. Skyrise/Protective Order & Inspection Protocol

[EXTERNAL SENDER]

Jim,

Could you please clarify both which devices you are referencing and the exact information that is needed, so I can be sure I'm collecting the right information from the right person?

Is this related to (A) the laptops that the parties' firms provided for installation of VMs or (B) devices that were provided from our respective clients' possession, custody or control?

(Please note that I've also added my associate, Annabel Mireles, to this email chain. She is working on this matter with me and will be one of our reviewers.)

Thank you,

Anthony

**Anthony D. Green, Esq.**

*Partner*

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---

**From:** Jim Vaughn <[JV Vaughn@idsinc.com](mailto:JV Vaughn@idsinc.com)>

**Sent:** Wednesday, June 8, 2022 4:17 PM

**To:** Anthony Green <[green.a@wsslip.com](mailto:green.a@wsslip.com)>; Kazim Naqvi <[KNaqvi@sheppardmullin.com](mailto:KNaqvi@sheppardmullin.com)>;  
[Kelley.Storey@lw.com](mailto:Kelley.Storey@lw.com)

**Cc:** Rena Andoh <[RAndoh@sheppardmullin.com](mailto:RAndoh@sheppardmullin.com)>; Travis Anderson  
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[tflynn@harrisbeach.com](mailto:tflynn@harrisbeach.com); Alexander Truitt <[truitt.a@wsslip.com](mailto:truitt.a@wsslip.com)>; Waqas Anis <[wanis@idsinc.com](mailto:wanis@idsinc.com)>

**Subject:** Re: Moog v. Skyrise/Protective Order & Inspection Protocol

We need the decryption keys rather than the login passwords.

Thanks

----

**Jim Vaughn, GCFE, EnCE**

**Managing Director**

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---

**From:** Anthony Green <[green.a@wssllp.com](mailto:green.a@wssllp.com)>  
**Date:** Wednesday, June 8, 2022 at 1:00 PM  
**To:** Jim Vaughn <[JVaughn@idsinc.com](mailto:JVaughn@idsinc.com)>, Kazim Naqvi <[KNaqvi@sheppardmullin.com](mailto:KNaqvi@sheppardmullin.com)>, "[Kelley.Storey@lw.com](mailto:Kelley.Storey@lw.com)" <[Kelley.Storey@lw.com](mailto:Kelley.Storey@lw.com)>  
**Cc:** Rena Andoh <[RAndoh@sheppardmullin.com](mailto:RAndoh@sheppardmullin.com)>, Travis Anderson <[TAnderson@sheppardmullin.com](mailto:TAnderson@sheppardmullin.com)>, Lai Yip <[LYip@sheppardmullin.com](mailto:LYip@sheppardmullin.com)>, "[MSubjeck@hodgsonruss.com](mailto:MSubjeck@hodgsonruss.com)" <[MSubjeck@hodgsonruss.com](mailto:MSubjeck@hodgsonruss.com)>, "[RFluskey@hodgsonruss.com](mailto:RFluskey@hodgsonruss.com)" <[RFluskey@hodgsonruss.com](mailto:RFluskey@hodgsonruss.com)>, "[SKYRYSEMOOG.LWTEAM@lw.com](mailto:SKYRYSEMOOG.LWTEAM@lw.com)" <[SKYRYSEMOOG.LWTEAM@lw.com](mailto:SKYRYSEMOOG.LWTEAM@lw.com)>, "[tflynn@harrisbeach.com](mailto:tflynn@harrisbeach.com)" <[tflynn@harrisbeach.com](mailto:tflynn@harrisbeach.com)>, Alexander Truitt <[truitt.a@wssllp.com](mailto:truitt.a@wssllp.com)>, Waqas Anis <[wanis@idsinc.com](mailto:wanis@idsinc.com)>  
**Subject:** RE: Moog v. Skyryse/Protective Order & Inspection Protocol

[EXTERNAL SENDER]

Jim,

Is what you need merely the passwords to open the devices our clients provided? Or is it something else entirely?

Thanks,

Anthony

**Anthony D. Green, Esq.**

*Partner*

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---

**From:** Jim Vaughn <[JVaughn@idsinc.com](mailto:JVaughn@idsinc.com)>  
**Sent:** Wednesday, June 8, 2022 3:47 PM  
**To:** Anthony Green <[green.a@wssllp.com](mailto:green.a@wssllp.com)>; Kazim Naqvi <[KNaqvi@sheppardmullin.com](mailto:KNaqvi@sheppardmullin.com)>; [Kelley.Storey@lw.com](mailto:Kelley.Storey@lw.com)  
**Cc:** Rena Andoh <[RAndoh@sheppardmullin.com](mailto:RAndoh@sheppardmullin.com)>; Travis Anderson <[TAnderson@sheppardmullin.com](mailto:TAnderson@sheppardmullin.com)>; Lai Yip <[LYip@sheppardmullin.com](mailto:LYip@sheppardmullin.com)>; [MSubjeck@hodgsonruss.com](mailto:MSubjeck@hodgsonruss.com); [RFluskey@hodgsonruss.com](mailto:RFluskey@hodgsonruss.com); [SKYRYSEMOOG.LWTEAM@lw.com](mailto:SKYRYSEMOOG.LWTEAM@lw.com); [tflynn@harrisbeach.com](mailto:tflynn@harrisbeach.com); Alexander Truitt <[truitt.a@wssllp.com](mailto:truitt.a@wssllp.com)>; Waqas Anis <[wanis@idsinc.com](mailto:wanis@idsinc.com)>  
**Subject:** Re: Moog v. Skyrise/Protective Order & Inspection Protocol

Kelley and Anthony (plus Kazim),

Have you had any luck connecting with Skyrise IT? I have the same question for Kazim on the Moog side and those computers. I'm going to start providing the machine ID information, here are 4 screenshots. They can be cross referenced to the evidence tracker I provided the other day. The IT department will know what to do with these. I do not want to be perceived as aggressive so I will not continue to follow-up, but instead just do what we can on our end and then standby.

Thanks

----

**Jim Vaughn, GCFE, EnCE**  
***Managing Director***

535 Anton Blvd., Suite 860 | Costa Mesa, CA. 92626  
Direct: 714.261.0348 | [jvaughn@idsinc.com](mailto:jvaughn@idsinc.com)  
[iDSinc.com](http://iDSinc.com)

---



**From:** Anthony Green <[green.a@wssllp.com](mailto:green.a@wssllp.com)>  
**Date:** Tuesday, June 7, 2022 at 3:06 PM  
**To:** Jim Vaughn <[JVaughn@idsinc.com](mailto:JVaughn@idsinc.com)>, Kazim Naqvi <[KNaqvi@sheppardmullin.com](mailto:KNaqvi@sheppardmullin.com)>, "[Kelley.Storey@lw.com](mailto:Kelley.Storey@lw.com)" <[Kelley.Storey@lw.com](mailto:Kelley.Storey@lw.com)>  
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**Subject:** RE: Moog v. Skyrise/Protective Order & Inspection Protocol

[EXTERNAL SENDER]

Hi Jim,

I will check on the issues you raised and will get back to you. I believe that at least one of the encrypted devices may be encrypted by Moog, so we may need to refer you to Moog, once we're clear on that.

I also need to update you on the full list of software to be installed and the specific individuals from Stroz Friedberg who will have inspection laptops and will do so ASAP.

Thanks,

Anthony

**Anthony D. Green, Esq.**

*Partner*

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**From:** Jim Vaughn <[JV Vaughn@idsinc.com](mailto:JV Vaughn@idsinc.com)>

**Sent:** Tuesday, June 7, 2022 12:26 PM

**To:** Kazim Naqvi <[KNaqvi@sheppardmullin.com](mailto:KNaqvi@sheppardmullin.com)>; [Kelley.Storey@lw.com](mailto:Kelley.Storey@lw.com)

**Cc:** Rena Andoh <[RAndoh@sheppardmullin.com](mailto:RAndoh@sheppardmullin.com)>; Travis Anderson

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**Subject:** Re: Moog v. Skyrise/Protective Order & Inspection Protocol

Dear Kelley and Anthony,

We are already seeing encryption set on the laptops as we are imaging them. Until we have decryption keys for them, we are unable to see or handle any of the data from the forensic images as we create them. Can you please ask Skyrise and/or the individual defendants to provide us with a full list of Bitlocker decryption keys ASAP! For Sheppard, I would ask that you do the same for the laptops we recently received, as we plan to image those over the next few days as well. If the IT teams from the respective companies need to reach out for geek speak, I would ask that you agree to let them, as it would be only for purposes of obtaining the decryption key for each device. If they need us to provide a machine ID, such as the one attached for item E0001, we can do so. But the point here is that we need to get them to move on this immediately so we do not lose precious time. I and my team are happy to work directly with the corporate IT department if that is who can provide the decryption keys to these devices. We are in the process of assembling a complete list of devices that we encounter encryption for, but my ask is that each IT team provide what they can without waiting for all of the images to be created. Please let me know.

Thanks

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**Jim Vaughn, GCFE, EnCE**

***Managing Director***

535 Anton Blvd., Suite 860 | Costa Mesa, CA. 92626

Direct: 714.261.0348 | [jvaughn@idsinc.com](mailto:jvaughn@idsinc.com)

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**From:** Jim Vaughn <[JV Vaughn@idsinc.com](mailto:JV Vaughn@idsinc.com)>

**Date:** Tuesday, June 7, 2022 at 8:23 AM

**To:** Kazim Naqvi <[KNaqvi@sheppardmullin.com](mailto:KNaqvi@sheppardmullin.com)>, "[Kelley.Storey@lw.com](mailto:Kelley.Storey@lw.com)" <[Kelley.Storey@lw.com](mailto:Kelley.Storey@lw.com)>

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**Subject:** Re: Moog v. Skyryse/Protective Order & Inspection Protocol

Hi Kazim and Kelley,

Just a quick update here. After sending the device inventory to the parties, we spent time last night and again this morning prioritizing the Defendant devices for imaging and extraction of email files so that we can locate the emails that will be identified by Latham for their review. We will start with computers, then large form factor USBs, then small form factor USBs, then mobile devices. I suspect we will run into password issues along the way for some of the devices, and we will start a list for the ones we will need access to. This is of course in addition to the USB I already identified yesterday that is inaccessible due to encryption. I suspect Anthony and his team is already working on that. That's it for now, more later as we progress.

Thanks

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**Jim Vaughn, GCFE, EnCE**

***Managing Director***

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Direct: 714.261.0348 | [jvaughn@idsinc.com](mailto:jvaughn@idsinc.com)

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**From:** Kazim Naqvi <[KNaqvi@sheppardmullin.com](mailto:KNaqvi@sheppardmullin.com)>  
**Date:** Monday, June 6, 2022 at 12:08 PM  
**To:** "Kelley.Storey@lw.com" <[Kelley.Storey@lw.com](mailto:Kelley.Storey@lw.com)>, Jim Vaughn <[JVaughn@idsinc.com](mailto:JVaughn@idsinc.com)>  
**Cc:** Rena Andoh <[RAndoh@sheppardmullin.com](mailto:RAndoh@sheppardmullin.com)>, Travis Anderson <[TAnderson@sheppardmullin.com](mailto:TAnderson@sheppardmullin.com)>, Lai Yip <[LYip@sheppardmullin.com](mailto:LYip@sheppardmullin.com)>, "MSubjeck@hodgsonruss.com" <[MSubjeck@hodgsonruss.com](mailto:MSubjeck@hodgsonruss.com)>, "RFluskey@hodgsonruss.com" <[RFluskey@hodgsonruss.com](mailto:RFluskey@hodgsonruss.com)>, "SKYRYSEMOOG.LWTEAM@lw.com" <[SKYRYSEMOOG.LWTEAM@lw.com](mailto:SKYRYSEMOOG.LWTEAM@lw.com)>, "tflynn@harrisbeach.com" <[tflynn@harrisbeach.com](mailto:tflynn@harrisbeach.com)>, "truitt.a@wssllp.com" <[truitt.a@wssllp.com](mailto:truitt.a@wssllp.com)>, "green.a@wssllp.com" <[green.a@wssllp.com](mailto:green.a@wssllp.com)>  
**Subject:** RE: Moog v. Skyrise/Protective Order & Inspection Protocol

[EXTERNAL SENDER]

Hi Jim:

I am just following up on Kelley's e-mail below, which I don't believe has received a response. At the Court's direction, the Parties are in the process of signing and filing the attached stipulation. Please see the June 8 and June 24 deadlines therein. I wanted to flag these to you to ensure that the privilege review process proceeds as agreed by the parties and as ordered by the Court. Please confirm the proposed excision process in Kelley's e-mail below is workable and will be completed by June 8.

Best,  
Kazim

**Kazim Naqvi**  
**SheppardMullin** | Los Angeles  
+1 424-288-5336 | ext. 15336

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**From:** [Kelley.Storey@lw.com](mailto:Kelley.Storey@lw.com) <[Kelley.Storey@lw.com](mailto:Kelley.Storey@lw.com)>  
**Sent:** Friday, June 3, 2022 8:41 AM  
**To:** [JVaughn@idsinc.com](mailto:JVaughn@idsinc.com)  
**Cc:** Rena Andoh <[RAndoh@sheppardmullin.com](mailto:RAndoh@sheppardmullin.com)>; Travis Anderson <[TAnderson@sheppardmullin.com](mailto:TAnderson@sheppardmullin.com)>; Lai Yip <[LYip@sheppardmullin.com](mailto:LYip@sheppardmullin.com)>; Kazim Naqvi <[KNaqvi@sheppardmullin.com](mailto:KNaqvi@sheppardmullin.com)>; [msubjeck@hodgsonruss.com](mailto:msubjeck@hodgsonruss.com); [rfluskey@hodgsonruss.com](mailto:rfluskey@hodgsonruss.com); [SKYRYSEMOOG.LWTEAM@lw.com](mailto:SKYRYSEMOOG.LWTEAM@lw.com); [tflynn@harrisbeach.com](mailto:tflynn@harrisbeach.com); [truitt.a@wssllp.com](mailto:truitt.a@wssllp.com); [green.a@wssllp.com](mailto:green.a@wssllp.com)  
**Subject:** Moog v. Skyrise/Protective Order & Inspection Protocol

Jim:

For the images of the five devices in iDS's custody sent by Skyrise (three laptops and two USB drives), and the 23 devices sent by the Individual Defendants, the parties would like iDS to isolate a set of a little more than 15,000 potentially privileged files identified by Skyrise and the Individual Defendants, so that the Defendants can review those files for privilege, while the remainder of files

which have not been identified as potentially privileged can be made available to Moog for review.

Please confirm that iDS can isolate this set of potentially privileged files (once the Defendants identify them for you), while making the remainder of files available for Moog's review.

Best,

**Kelley Storey**

Pronouns: she/her/hers

**LATHAM & WATKINS LLP**

555 Eleventh Street, NW | Suite 1000 | Washington, D.C. 20004-1304

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